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8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 In re:

12 **PROFESSIONAL FINANCIAL INVESTORS,
13 INC., a California corporation, et al.,**

14 **Debtors.**

15 Case No. 20-30604 (HLB)

16 (Jointly Administered)

17 Chapter 11

18 **DECLARATION OF MICHELLE
19 HERMAN IN SUPPORT OF
TRUSTEE'S SEVENTH OMNIBUS
20 OBJECTION (SATISFIED
SCHEDULED REAL ESTATE
PROPERTY TAX CLAIMS)**

21 Date: March 17, 2022
22 Time: 10:00 a.m.
23 Judge: Hon. Hannah L. Blumenstiel
24 Place: Telephonic/Video
Appearances Only

25 I, Michelle Herman, declare:

26 1. I am a Senior Managing Director of FTI Consulting, Inc. ("FTI"), financial advisor to
the PFI Trust and make this declaration of my own personal knowledge. If called as a witness, I
could and would testify competently thereto.

27 2. I make this declaration in support of the *PFI Trustee's Seventh Omnibus Objection*
(*Satisfied Schedule Real Estate Property Tax Claims*) (the "Omnibus Objection"). Capitalized terms
not otherwise defined herein shall have the meanings ascribed to them in the Omnibus Objection.

3. On May 13, 2021, the Debtors filed their amended schedules, which listed certain secured real estate taxes owed to governmental authorities. The Debtors' scheduled real estate tax obligations were paid during the pendency of the cases.

4. I have determined that each Claim on Exhibit 1 should be disallowed because each is unenforceable against the Debtors under applicable law as the Claims have been satisfied and should therefore be disallowed and expunged from the claims registry in order to ensure that a double recovery is not received

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed this 10 day of February 2022 at Los Angeles, California.

Michelle Werner

Michelle Herman